SYRÁREŇ BEL SLOVENSKO a.s. (BEL Slovakia)

CONSUMERS' PERSONAL DATA PROTECTION POLICY

1. BEL'S COMMITMENT FOR PRIVACY

To best meet our Consumers' expectation and forge with them the strongest links possible, our Group is often led to collect Personal Data by different meanings. Consumers must be assured that we take the best care to guarantee the confidentiality of every personal information exchanged between them and our Group and Brands.

Bel undertakes not to violate your privacy and ensures full transparency and security while collecting and storing your personal data.

As a part of this commitment, we have implemented a policy on processing our consumer's personal data. This Consumer's personal data Policy describes conditions in which BEL will use your personal data.

The entity responsible for the collection of your Personal Data is Syráreň Bel Slovensko, a. s.,Lastomírska 1, 071 01 Michalovce.

2. CONSENT

« Personal data » must be understood as any collected information relating to an identified or identifiable individual; such individual is a person that can be identified directly or indirectly, in particular by general identifier or by one or more characteristics or factors specific to their physical, physiological, psychic, mental, economic, cultural or social identity.

Before you give us any personal information, we strongly recommend you to read carefully this Policy.

BEL will use your Personal Data for marketing purposes. Your consent might be asked before any collection of personal information and for the purpose of such collection; if applicable legal regulations do not stipulate otherwise.

3. PROTECTION OF CONSUMERS' PERSONAL DATA: PRINCIPLES

- ***Legitimacy:*** *It is inevitable that the purpose of personal data collection is stipulated before the start of procession of personal data. The data will be collected for specific, explicit and legitimate purposes; fully in accordance with Constitution of the Slovak republic, constitutional acts, acts and international treaties binding the Slovak republic. Processing will not involve sensitive data (e.g. racial or ethnic origin, political, philosophical or religious opinion, union membership of persons, health or sex life).*

- ***Relevance:*** *Collected data will be suitable, relevant and non-excessive with regard to the purposes for which they are collected;*

- ***Accuracy:*** *The data related to the purpose of its procession will be accurate, complete and, if necessary, up to date; inaccurate and incomplete data will be blocked and amended or added without undue delay; inaccurate and incomplete data that cannot be amended or added to attain its accuracy and completeness will be specifically marked and disposed of without undue delay;*

- ***Transparency:*** *Your Personal Data will be collected solely with regard to the stipulated purpose about which you will be informed; it is prohibited to collect Personal Data under disguise of other purpose of its procession or other activity. Personal Data shall be processed and used solely in a manner that corresponds to the purpose for which is has been collected; it is prohibited to gather Personal Data collected for different purposes; relating to this collection and process of their data and notably concerning the purpose and recipients of such information.*

- ***Storage:*** *The data will be kept in a form allowing identification of individuals for a time period that does not exceed the period required for the purposes for which they are collected and processed;*

- ***Consent:*** *The person concerned must have given his consent to the processing of his data;*

- ***Confidentiality & Security:*** *We will assure confidentiality and security of every collected Personal Data by implementing reasonable technical measures.*

4. SCOPE

This Policy is applicable to:

- *Each processing of Personal Data that might be done within our relationship with our consumers.*
- *Every BEL's websites, notably: http://www.bel-slovakia.sk*

5. TYPE OF COLLECTED PERSONAL DATA

Depending on the kind of relationship we have with you, we will be led to ask you for information about you and/or family members such as:

- *contacts (last name, first name, phone number, e-mail, …)*
- *personal information (date of birth, …)*
- *information about your family (number of person, age, …)*
- *your consumption habits as regards to dairy products/cheeses*

BEL considers that parents should be informed of the relation between our company and our brands and their young children. That is why BEL undertakes to ask for parents'/guardians' e-mail addresses of Internet users under 12 in order to copy them of every e-mail asking for children personal data. At any time, parents/guardians will be entitled on demand to have access to personal data concerning their child and ask for their modification or deletion from our consumer's database by contacting our consumer service.

6. MOMENT OF COLLECTION OF PERSONAL DATA

Your Personal Data could be collected at different points and notably:

- *When contacting our consumer's service (questions, claims, …)*
- *When participating to marketing programs or animations (contests, games, newsletters, …)*
- When browsing our BEL Group websites

7. PURPOSE FOR COLLECTION OF PERSONAL DATA

- *Answer to every request you may have before the consumer's service*
- *Improve our products notably thanks to a better understanding of your needs and desires*
- *Download some discount vouchers from BEL Group websites*
- *Send you newsletters, promotions or offers from partners. At any time, you can cancel your subscription to these newsletters by clicking on the provided link at the bottom of these e-mails.*
- *Secure and improve your use of BEL websites (browsing, security of data,…)*
- Be in compliance with applicable legal regulations

8. COMMUNICATION OF YOUR PERSONAL INFORMATION

In some cases, we will be led to transfer your personal data to internal and external recipients:

- *Internal recipients are authorized persons, notably:*
  - *IT Services*
  - *Marketing services*
- *External recipients, notably:*
  - *External service providers : third-party IT service, call centers, printers*
  - *Commercial partners, management of promotional operations companies*

9. SECURITY

BEL take the best care, by taking appropriate technical, organizational and personal measures, to guarantee against accidental or not accidental loss or destruction, or against unauthorized access or disclosure of your Personal Data.

10. COOKIES

BEL informs you that it is likely to use temporary "cookies" valid while visiting the Website.
These cookies are data stored in the RAM of your computer. They do not allow us to identify you; on the other hand, they store information on the browsing or your computer on the Website (the pages that you have viewed, the date and time of the viewing, etc.) that we can read during your later visits.
The purpose of the data gathered using the cookies is to identify you when you want to connect to your personal space and to memorise your connection to the Site.
When you close your Internet browser, they are not saved.
We inform you that you can object to the saving of cookies on your computer by clicking here [Insert the accurate link] or by changing your browser settings as follows:

- *If you browse on the Internet with Internet Explorer (Microsoft): choose the "Tools" menu, then "Internet Options", click on the "Privacy" tab. Then "Advanced Privacy Settings", click on "Override automatic cookie handling" and select "Reject all cookies" (internal and third party). Click on "OK".*
- *For Firefox: choose "Tools" then "Options". In the "Privacy" tab, tick "Tell websites I do not want to be tracked". Click on OK.*
- *For Chrome, click on "Settings" then "Show Advanced Settings". Then in "Privacy", click on "Content settings" and make your choice in the Cookies part.*

If you use versions of browsers other than those stated: please refer to the help files or to the user manual.

11. DATA STORAGE BY BEL

Your Personal Data will not be stored for a time period exceeding the necessary term to the purpose of their collection, according to applicable law.

12. ACCESS AND MODIFICATION

At any time, we will be able to access your Personal Data and ask for their modification by contacting the consumer's service at the following address or by clicking on the link below:

Production:
Syráreň Bel Slovensko, a. s.
Lastomírska 1
071 01 Michalovce

telefón : +421 (0) 56 6413 111
+421 (0) 56 6413 188
fax: +421 (0) 56 6413 201

Sales and marketing department:

Syráreň Bel Slovensko, a. s.
Kalinčiakova 27
831 04 Bratislava

telefón / fax: +421 (0) 2 4445 4685
e-mail: informacie@groupe-bel.com

The same applies if your Personal Data are not accurate, complete or updated: you can contact our consumer's service as mentioned above.

You can also refuse the collection or the processing of your Personal Data in the same conditions as above.

Your rights of a concerned person under Act No. 122/2013 Call on personal data protection as amended shall be exercised as follows:
a) in writing and the content of your request shall indicate that you exercise your right of a concerned person. In such case, this request is considered as submitted under Act No. 122/2013 Coll. on personal data protection as amended; request submitted electronically, by e-mail or fax shall be delivered in writing within 3 days since from the date of its sending,
b) in person orally to the form of minutes that shall indicate who exercised the right, what is sought and when and who drew up the minutes, their signature and signature of a concerned person; you will receive a copy of such minutes from BEL.

13. COLLECTION OF THIRD PERSON PERSONAL DATA

Some of our websites can offer you the chance to send a link to a Group website's page to third persons. In such case, we will have to collect your and third person's e-mail addresses.
Every e-mail address collected in such case will only be used for that purpose and will be deleted right afterwards.

14. UPDATES

This Policy could evolve periodically and we this recommend to read it regularly.

Clause to be inserted in contracts to be concluded with service providers
Znenie dodatku k zmluvám uzatváranými s poskytovateľmi služieb

1. The Contractual parties under prov. § 8 Act No. 122/2013 Coll. on on personal data protection as amended agreed that company SYRÁREŇ BEL SLOVENSKO a.s., ID No.: 31 651 321, residing Lastomírska 1, 071 01 Michalovce, registered at Commercial register of District court Košice I, section: Sa, insertion No.: 238/V (hereinafter referred to as "operator SYRÁREŇ BEL SLOVENSKO a.s.") entrusts to the Service Provider (it is needed to identify the contractual party in the scope of title, name, surname, date of birth, address of permanent residence for natural person, name, legal form, address of residence and ID No. for artificial person (company), business name, place of performance of the business, ID No. for natural person – entrepreneur) as the contractor (hereinafter referred to as "the contractor ") procession of the Personal Data on behalf of operator SYRÁREŇ BEL SLOVENSKO a.s. as of the date of entering into the force of this addendum/contract/or specific date.
(Please mind: The operator is obliged to conclude contract under point 1 before start of personal data procession by the contractor, on the day of rhe start of personal data procession at the latest. The contractor is entitled to process personal data solely in the scope, under condition, in a manner and for the purpose stipulated in this contract and in accordance with legal regulations.)
1. Zmluvné strany sa dohodli, že v súlade s ust. § 8 zákona č. 122/2013 Z.z. o ochrane osobných údajov a o zmene a doplnení niektorých zákonov v znení neskorších predpisov obchodná spoločnosť SYRÁREŇ BEL SLOVENSKO a.s., IČO: 31 651 321, so sídlom Lastomírska 1, 071 01 Michalovce, zap. v Obchodnom registri Okresného súdu Košice I, odd.: Sa, vložka č.: 238/V (ďalej len ako „SYRÁREŇ BEL SLOVENSKO a.s.") ako prevádzkovateľ poveruje poskytovateľa služieb (identifikovať zmluvnú stranu v rozsahu titul, meno, priezvisko, dátum narodenia a adresu trvalého pobytu, ak ide o fyzickú osobu, názov, právnu formu, adresu sídla a identifikačné číslo, ak ide o právnickú osobu, obchodné meno, adresu miesta podnikania a identifikačné číslo, ak ide o fyzickú osobu – podnikateľa) ako sprostredkovateľa (ďalej len ako "sprostredkovateľ") spracúvaním osobných údajov v mene prevádzkovateľa SYRÁREŇ BEL SLOVENSKO a.s., a to odo dňa účinnosti tohto dodatku/tejto zmluvy /alebo uviesť konkrétny dátum.
(Upozornenie: Prevádzkovateľ je povinný uzatvoriť so sprostredkovateľom zmluvu podľa bodu 1 pred začatím spracúvania osobných údajov, najneskôr v deň začatia spracúvania osobných údajov. Sprostredkovateľ je oprávnený spracúvať osobné údaje len v rozsahu, za podmienok, spôsobom a na účel dojednaný s prevádzkovateľom v zmluve a v súlade so zákonom.)

2. *"Personal data" must be understood as any collected information relating to an identified or identifiable individual; such individual is a person that can be identified directly or indirectly, in particular by general identifier or by one or more characteristics or factors specific to their physical, physiological, psychic, mental, economic, cultural or social identity (hereinafter the "Personal Data").*
2. Osobnými údajmi sú údaje týkajúce sa určenej alebo určiteľnej fyzickej osoby, pričom takou osobou je osoba, ktorú možno určiť priamo alebo nepriamo, najmä na základe všeobecne použiteľného identifikátora alebo na základe jednej či viacerých charakteristík alebo znakov, ktoré tvoria jej fyzickú, fyziologickú, psychickú, mentálnu, ekonomickú, kultúrnu alebo sociálnu identitu.

3. Contractual parties agreed that procession of personal data under this contract means procession of personal data of customers of SYRÁREŇ BEL SLOVENSKO a.s. and BEL Group including Internet users browsing on the Group's websites, even if they are not consumers of Bel products (hereinafter referred to as "concerned persons") in the scope of (it is needed to fill in list of processed personal data, e.g. title, name, surname, date of birth, address of permanent residence, e-mail, telephone number) from information system (it is needed to fill in the name of information system) for the purpose of:

- *Answer to every request you may have before the consumer's service,*
- *Improvement of our products notably thanks to a better understanding of your needs and desires,*
- *Downloading discount vouchers from BEL Group websites ,*
- *Sending newsletters, promotions or offers from partners,*
- *Security and improvement of your use of BEL websites (browsing, security of data,…),*
- *Being in compliance with applicable legal regulations.*

(In the case of a specific collection which would appear in here, you will have to inform consumers about the purpose of the collection at the same moment that you will ask for their consent.)

(Please mind: Consent of concerned person is not needed for the purposes of entrusting personal data procession to the contractor.)

3. Zmluvné strany sa dohodli, že spracúvaním osobných údajov podľa tejto zmluvy sa rozumie spracúvanie osobných údajov zákazníkov SYRÁRNE BEL SLOVENSKO a.s. a Skupiny BEL vrátane každého používateľa internetu prehliadajúceho webové stránky Skupiny BEL (ďalej len ako „dotknuté osoby“) v rozsahu (doplniť zoznam osobných údajov, ktoré sa budú spracúvať, pr. titul, meno, priezvisko, dátum narodenia, adresa trvalého bydliska, e-mail, telefónne číslo) z informačného systému (doplniť názov informačného systému) za účelom:

- zabezpečenia odpovede na každú požiadavku adresovanú oddeleniu služby zákazníkom,
- zlepšenia produktov Skupiny BEL, najmä vďaka lepšiemu porozumeniu potrieb a želaní dotknutých osôb,
- zabezpečenia sťahovania zľavových kupónov dotknutými osobami z webových stránok Skupiny BEL,
- zabezpečenia zasielania newsletterov, propagácií alebo ponúk od partnerov Skupiny BEL,
- zabezpečenia a vylepšenia používania webových stránok Skupiny BEL (prehliadanie, zabezpečenie údajov,…),
- zabezpečenia súladnosť postupov so všeobecne záväznými právnymi predpismi.
  (v prípade potreby doplniť ďalšie účely spracúvania osobných údajov)

(Upozornenie: Na účely poverenia sprostredkovateľa spracúvaním osobných údajov sa súhlas dotknutej osoby nevyžaduje.)

4. The contractual parties agreed on following conditions of personal data procession by contractor including following allowed operations with personal data:

- *The contractor is entitled to process the personal data solely in accordance with the instructions received from the operator SYRÁREŇ BEL SLOVENSKO a.s., in accordance with this contract and applicable legal regulations, notably Act No. 122/2013 Coll. on personal data protection as amended.*
- *The contractor is obliged to take the necessary privacy and security measures to protect the Personal Data against destruction, loss, alteration, circulation or unauthorised access, particularly as part of the transmission of the Personal Data on a network, as well as against any other form of illegal processing, and will report on these measures on the request of the operator SYRÁREŇ BEL SLOVENSKO a.s. without delay, no later than within 3 days since the delivery of such request to the contractor;*
- *i) The contractor is obliged to perform the personal data procession in person./*
  ii) The contractor is entitled to perform the personal data procession also by the medium of the third person (hereinafter referred to as "the sub-contractor"). The sub-contractor is obliged to process the personal data and secure their protection in the same scope as the contractor in accordance with this contract and on the responsibility of the contractor. (In case of selection of provision ii), the entitlement to process the personal data in the medium of the third person is granted to contractor, as this entitlement is possible to grant solely in the contract between the contractor and the operator or in the form of the addendum to such contract.)
- *The contractor is entitled to transfer any Personal Data outside the European Union solely after the consent of the operator SYRÁREŇ BEL SLOVENSKO a.s. is given, and in the event of agreement, the contractor is obliged to sign the standard contractual clauses stipulated by the European Commission or will take any necessary measure in accordance with the law.*
- *At the end of the contract, the contractor is obliged to return all of the Personal Data in accordance with the terms stipulated in the contract and will destroy all of the manual or electronic files comprising the Personal Data.*

4. Zmluvné strany sa dohodli na nasledovných podmienkach spracúvania osobných údajov

- Sprostredkovateľ je oprávnený spracúvať osobné údaje len na účel uvedený s tejto zmluve a len v súlade s pokynmi prevádzkovateľa SYRÁREŇ BEL SLOVENSKO a.s., touto zmluvou a všeobecne záväznými právnymi predpismi, najmä v súlade so zákonom č. 122/2013 Z.z. o ochrane osobných údajov a o zmene a doplnení niektorých zákonov v znení neskorších predpisov.
- Sprostredkovateľ je povinný zabezpečiť ochranu osobných údajov primeranými bezpečnostnými opatreniami pred ich zničením, poškodením, stratou, pozmenením, únikom alebo neoprávneným prístupom tretích osôb, najmä v súvislosti s prenosom osobných údajov po sieti, ako aj pred akýmkoľvek iným spôsobom neoprávneného spracúvania osobných údajov. Sprostredkovateľ je povinný oznámiť implementované bezpečnostné opatrenia prevádzkovateľovi SYRÁREŇ BEL SLOVENSKO a.s. na jeho žiadosť bezodkladne, najneskôr v lehote 3 pracovných dní odo dňa doručenia tejto žiadosti sprostredkovateľovi.
- i) Sprostredkovateľ je povinný vykonávať spracúvanie osobných údajov osobne./
  ii)Sprostredkovateľ je oprávnený vykonávať spracúvanie osobných údajov aj prostredníctvom inej osoby (ďalej len "subdodávateľ"). Subdodávateľ je povinný spracúvať osobné údaje a zabezpečiť ich ochranu v rovnakom rozsahu ako sprostredkovateľ v súlade s touto zmluvou a na zodpovednosť sprostredkovateľa. (V prípade voľby možnosti zmluvného dojednania ii) dochádza k udeleniu oprávnenia sprostredkovateľovi spracúvať osobné údaje prostredníctvom subdodávateľa, nakoľko toto oprávnenie je možné udeliť len v zmluve medzi sprostredkovateľom a prevádzkovateľom alebo formou dodatku k takejto zmluve.)
- Sprostredkovateľ je oprávnený vykonávať prenos osobných údajov do tretích krajín len so súhlasom prevádzkovateľa SYRÁREŇ BEL SLOVENSKO a.s. a len v prípade, že prijme primerané záruky ochrany súkromia a základných práv a slobôd jednotlivcov a výkonu príslušných práv, ktoré vyplývajú zo štandardných zmluvných doložiek prijatých Európskou komisiou.
- Sprostredkovateľ je povinný po ukončení tejto zmluvy odovzdať všetky spracúvané osobné údaje prevádzkovateľovi SYRÁREŇ BEL SLOVENSKO a.s. a zlikvidovať všetky súbory a databázy obsahujúce tieto osobné údaje uchovávané automatizovaným a/alebo neautomatizovaným spôsobom.

5. *The operator SYRÁREŇ BEL SLOVENSKO a.s. does hereby declare that he minded the contractor´s expert, technical, organizational and personal capacity and ability to guarantee the security of processed personal data by measures according to prov. § 19 par. 1 of Act No. 122/2013 Coll. on personal data protection as amended, when choosing the contractor. The operator does hereby mind that he cannot entrust the personal data procession to the contractor, if the rights and legitimate interests of concerned persons might by endangered by doing so.*
5. Prevádzkovateľ SYRÁREŇ BEL SLOVENSKO a.s. vyhlasuje, že pri výbere sprostredkovateľa dbal na jeho odbornú, technickú, organizačnú a personálnu spôsobilosť a jeho schopnosť zaručiť bezpečnosť spracúvaných osobných údajov opatreniami podľa § 19 ods. 1 zákona č. 122/2013 Z.z. o ochrane osobných údajov a o zmene a doplnení niektorých zákonov v znení neskorších predpisov. Prevádzkovateľ berie na vedomie, že nesmie zveriť spracúvanie osobných údajov sprostredkovateľovi, ak by tým mohli byť ohrozené práva a právom chránené záujmy dotknutých osôb.

6. The operator SYRÁREŇ BEL SLOVENSKO a.s. reserves the right to carry out or have a third party carry out any check that would prove useful to it to check compliance with the aforementioned obligations by the contractor. The operator SYRÁREŇ BEL SLOVENSKO a.s. can immediately terminate the contract, without compensation for the contractor, in the event of a breach in data privacy or non-compliance with one of the obligations stipulated in this contract or in the Act No. 122/2013 Coll. on personal data protection as amended.
6. Prevádzkovateľ SYRÁREŇ BEL SLOVENSKO a.s. si vyhradzuje právo vykonať kontrolu resp. vykonať kontrolu prostredníctvom tretej osoby v mene prevádzkovateľa SYRÁREŇ BEL SLOVENSKO a.s. akýmkoľvek spôsobom za účelom overenia plnenia tejto zmluvy sprostredkovateľom. V prípade, ak sprostredkovateľ poruší akúkoľvek povinnosť stanovenú v tejto zmluve alebo zákonom č. 122/2013 Z.z. o ochrane osobných údajov a o zmene a doplnení niektorých zákonov v znení neskorších predpisov, prevádzkovateľ SYRÁREŇ BEL SLOVENSKO a.s. si vyhradzuje právo odstúpiť od tejto

Please mind: The contractor is always obliged at the first contact with the concerned person to inform them, that he processes their personal data on behalf of the operator for stipulated purposes.
Upozornenie: Sprostredkovateľ je vždy povinný pri prvom kontakte s dotknutou osobou oznámiť, že spracúva jej osobné údaje v mene prevádzkovateľa na vymedzený alebo ustanovený účel.

Please mind: If the operator entrusted the personal data procession to the contractor only after the collection of personal data, the operator is obliged to secure announcement of this fact to the concerned persons at the first contact with them, no later than within 3 months since the date of entrustment of the contractor. The operator is also obliged to do so even if the personal data procession is taken over by the legal successor of the operator. The operator is not obliged to inform the concerned person about this fact, if the contractor informs the concerned person in the same period at the first contact with them about the procession of their personal data on behalf of the operator for stipulated purposes.
Upozornenie: Ak prevádzkovateľ poveril spracúvaním osobných údajov sprostredkovateľa až po získaní osobných údajov, je povinný zabezpečiť oznámenie tejto skutočnosti dotknutým osobám pri prvom kontakte s nimi, najneskôr však do troch mesiacov odo dňa poverenia sprostredkovateľa. To platí aj vtedy, ak spracúvanie osobných údajov prevezme právny nástupca prevádzkovateľa. Prevádzkovateľ nemusí dotknutej osobe informáciu podľa prvej vety oznamovať, ak sa v rovnakej lehote sprostredkovateľ v rámci svojej povinnosti pri prvom kontakte s dotknutou osobou oznámil, spracúva jej osobné údaje v mene prevádzkovateľa na vymedzený alebo ustanovený účel.

*Please mind: **It is inevitable** that the contract concluded between the operator SYRÁREŇ BEL SLOVENSKO a.s. and the contractor **contains** the period for which is the contract concluded, the date of the conclusion of the contract and signatures of the contractual parties.*
Upozornenie: Zmluva uzatváraná medzi prevádzkovateľom SYRÁREŇ BEL SLOVENSKO a.s. a sprostredkovateľom **musí obsahovať** dobu, na ktorú sa zmluva uzatvára, dátum uzatvorenia zmluvy a podpisy zmluvných strán.